

**EXHIBIT 1**

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

**SAMPLE**

In re:	)	Chapter 11
	)	
W. R. GRACE & CO., <u>et al.</u> <sup>1</sup>	)	Case No. 01-01139 (JKF)
	)	Jointly Administered
Debtors.	)	
	)	
	)	Hearing Date: Not Applicable
	)	Responses Due: July 25, 2005

Claimant: JOHNSON JR, BURRELL  
Claim Number: 2238  
Date Claim Filed: 9/20/2002

**NOTICE OF INTENT TO OBJECT TO CLAIM ON THE BASIS OF MATERIALLY  
INSUFFICIENT SUPPORTING INFORMATION AND OPPORTUNITY TO  
SUPPLEMENT CLAIM**

On April 2, 2001, each of the Debtors in the above-captioned chapter 11 cases filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code commencing their respective chapter 11 cases in the United States Bankruptcy Court for the District of Delaware (the "Court").

By an order dated April 25, 2002, the Court set March 31, 2003, as the last date for filing proofs of claim for all prepetition claims relating to asbestos property damage claims, non-

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<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co.-Conn., A-I Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., G C Limited Partners I, Inc. (f/k/a Grace Cocoa Limited Partners I, Inc.), G C Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation, W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

asbestos claims (including all governmental claims), and medical monitoring claims (the “Bar Date”). A bar date has yet to be set for asbestos personal injury claims and claims related to Zonolite Attic Insulation.

The Debtors are in the process of reviewing all claims filed, and, during this review process, the Debtors have discovered, among other things, that certain proofs of claim were filed with (a) no supporting documentation submitted to validate the claim; (b) materially insufficient supporting documentation to validate the claim; and/or (c) the claimant failing to answer one or more specific questions that require answers necessary to support the claim (collectively, “Materially Insufficient Supporting Information”).

On July 19, 2004, the Court entered an Order [Docket No. 6009] (the “Order”), pursuant to which the Debtors, prior to asserting any objection to a claim on the basis of Materially Insufficient Supporting Information, must serve written notice by first-class United States mail of the Debtors’ intent to object to the respective claim on the basis of Materially Insufficient Supporting Information upon: (a) any claimant as to whom such objection is to be asserted; (b) counsel for such claimant; (c) counsel for the Official Committee of Asbestos Property Damage Claimants; and (d) counsel for the Official Committee of Unsecured Creditors (the “Notice”).

On February 14, 2005, the Court entered an Order [Docket No. 7771] (the “Gateway Supplemental Notice Order”) pursuant to which the Debtors were directed to include in the Notice, in reasonable detail, why the Debtors believe the documentation supplied with the claim is materially insufficient.

**PLEASE TAKE NOTICE** that attached as Exhibit A is a checklist which (1) outlines the documentation that is missing from your claim or (2) explains the reasons why the Debtors believe that the documentation that was provided with your claim is materially insufficient. **PLEASE NOTE** that if a question on the checklist is not marked, it means you (1) responded to

that question by indicating that you have no documentation or (2) your response to this question was adequate, and in either case, the Debtors are not expecting further information from you at this time with respect to this question, although you are free to provide documentation if you have obtained any since filing your proof of claim. However, this does not mean the Debtors believe your documentation is sufficient to sustain your claim and the Debtors reserve their rights to object to your claim on any and all grounds.

**PLEASE TAKE FURTHER NOTICE** that you have sixty (60) days (the "Response Period") from the date of this Notice in which to provide any supplemental or additional information supporting the respective claims. Such information must be sent to the following addresses:

**By Mail:**

Rust Consulting, Inc.  
Claims Processing Agent  
Re: W.R. Grace and Co. (Supplemental Information)  
P.O. Box 162  
Faribault, Minnesota 55021-1620

**By Courier:**

Rust Consulting, Inc.  
Claims Processing Agent  
Re: W.R. Grace and Co. (Supplemental Information)  
201 South Lyndale Avenue  
Faribault, Minnesota 55021

-and-

Kirkland & Ellis LLP  
200 E. Randolph Drive  
Chicago, Illinois 60601  
Attn: Joseph S. Nacca

**PLEASE TAKE FURTHER NOTICE** that each claimant who provides any supplemental or additional information supporting his/her/its respective claim must include with that information:

- (a) a caption setting forth the names of the Debtors and the case number;
- (b) the name of the claimant, the original claim number of the claim for which the claimant is providing supplemental information, claimant's federal taxpayer ID, and a description of the basis for the amount of the claim; and
- (c) the name, address, telephone number, and fax number of the person(s) (which may be the claimant or the claimant's legal representative) with whom counsel for the Debtors should communicate with respect to the claim and who possesses authority to reconcile, settle, or otherwise resolve the claim on behalf of the claimant.

**PLEASE TAKE FURTHER NOTICE** that, following the Response Period, the Debtors may assert any applicable objections to your claims (or those of your client), including, but not limited to, objections on the basis of Materially Insufficient Supporting Information.

Dated: May 24, 2005

**W. R. GRACE & CO., et al.**

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and

/s/  
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Possession

